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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

-----X  
In re:

CIRCUIT CITY STORES, INC., et al.,  
Chapter 11

Debtor(s).  
Case No. 08-35653 (KRH)  
Jointly Administered  
-----X

**MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL  
BANKRUPTCY RULE 2090-1(E)(2)**

COMES NOW THE MOVANT, Paul Schrader (the “Movant”), a member in good standing of the bar of the Supreme Court of Virginia, and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”), and an associate of Fullerton & Knowles, PC, and hereby moves (the “Motion”) this Court to enter an order authorizing Wanda Borges of Borges & Associates, LLC, to appear *pro hac vice* before this Court to represent Alameda Newspapers, Inc., Alameda Newspaper Group Inc., Bay Area News Group East Bay, LLC, BayAreaNewsGroup, BayAreaNews Group, MediaNews Group, Inc., ANG Newspapers, Contra Costa Times, Contra Costa Times Inc., San Jose Mercury-News, Inc., San Jose Mercury News, San Jose Mercury News, Inc., San Jose Mercury-News, The San Jose

Mercury News, and/or SJ Mercury News (collectively, “Bay Area News Group, et al.”) in the above-captioned chapter 11 bankruptcy case(s) pursuant to Rule 2090-1(E)(2) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”). In support of the Motion, the Movant states as follows:

1. Wanda Borges is the principal member of Borges & Associates, LLC and has appeared regularly before numerous bankruptcy courts throughout the United States in Chapter 11 cases.
2. Ms. Borges is admitted to practice and in good standing as a member of the bar of the State of New York. Among other courts, she is admitted to practice in the United States District Court for the Southern, Eastern, Northern, and Western Districts of New York; the United States District Court for the District of Connecticut; the Second Circuit Court of Appeals; and the Supreme Court of the United States.
3. Ms. Borges has been practicing law since 1979 and has not been reprimanded in any court nor has there been any action in any court pertaining to Ms. Borges’ conduct or fitness as a member of any bar.
4. Ms. Borges hereby certifies that, within 90 days before the submission of this application, she has read the Local Rules of this Court and that her knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.
5. Ms. Borges has completed the necessary written application, a copy of which is attached hereto as Exhibit 1 and incorporated herein by reference.
6. The Movant hereby requests that this Court grant this Motion and Ms. Borges be admitted to appear before this Court *pro hac vice*.

7. It is understood that admission *pro hac vice* does not constitute formal admission to the bar of the United States District Court for the Eastern District of Virginia.

**WAIVER OF MEMORANDUM OF LAW**

8. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant request that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

**WHEREFORE**, the Movant respectfully requests that this Court enter an order, (i) authorizing Wanda Borges to appear *pro hac vice* in association with the Movant as attorneys for Bay Area News Group, et al. and (ii) granting such other and further relief as is just and proper.

Dated: January 31, 2011

Respectfully submitted,

/s/ Paul Schrader  
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**CERTIFICATION OF SERVICE**

I hereby certify that on the 31<sup>th</sup> day of January 2011, the foregoing Motion and proposed order have been endorsed by all necessary parties, filed on January 28, 2011 using the Court's CM/ECF system and thereby served electronically upon all registered users of the ECF system requesting service in this matter.

/s/ Paul Schrader